

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

HANK CAMPBELL

PLAINTIFF

v.

CIVIL ACTION NO.: 3:23cv130-HTW-LGI

**MAKERSTAR CAPITAL, INC.; JEFFREY BELL,
IN HIS OFFICIAL CAPACITY AS A REPRESENTATIVE
OF MAKERSTAR CAPITAL, INC.
AND DOES 1-10**

DEFENDANTS

**MOTION TO WITHDRAW AS COUNSEL FOR MAKERSTAR CAPITAL, INC. AND
JEFFREY BELL, IN HIS OFFICIAL CAPACITY AS A REPRESENTATIVE OF
MAKERSTAR CAPITAL, INC.**

COME NOW, undersigned counsel, Dorsey R. Carson, Jr., Kathryn P. Goff, Nicholas J. Toca, and Carson Law Group, PLLC (“Counsel”) and move the Court for leave to withdraw as counsel for Defendants, MakerStar Capital, Inc. (“MakerStar”) and Jeffrey Bell, in His Official Capacity as a Representative of MakerStar Capital, Inc. (“Bell”). In support thereof, Counsel would show:

1. Counsel has been unable to communicate with MakerStar or Bell.
2. MakerStar and Bell have also failed comply with payment obligations.
3. Due to a lack of communication and understanding between Counsel and MakerStar and Bell, Counsel believes it is impossible to effectively represent MakerStar and Bell in this matter.
4. Counsel have taken reasonable steps to contact MakerStar and Bell, including sending emails regarding the status of this matter and inquiring as to the clients’ chosen course of action. All efforts to communicate with MakerStar and Bell have proven unsuccessful.

5. Counsel have good cause for the submission of this motion. *See, e.g., Hardi N. Am., Inc. v. Schindler*, No. 4:18-CV-00083-JMV, 2019 WL 5866588 (N.D. Miss. Feb. 5, 2019) (granting withdrawal based on counsel's inability to communicate with client).

6. Counsel have advised MakerStar and Bell of their intent to withdraw from this matter, to which Counsel has received no response.

7. This matter is not presently set for trial.

8. In accordance with Local Rule 83.1(b)(3), Counsel will send notice of this motion to MakerStar and Bell at their last known addresses.

9. Due to the straightforward nature of the relief sought in this motion, Counsel respectfully requests the Court waive the requirement of filing a separate supporting memorandum. L.U. Civ. R. 7(b)(2).

WHEREFORE, undersigned counsel requests the Court enter an Order granting this Motion and allow Dorsey R. Carson, Jr., Kathryn P. Goff, Nicholas J. Toca, and Carson Law Group, PLLC to withdraw as counsel of record for MakerStar Capital, Inc. and Jeffrey Bell.

Respectfully submitted, this 27th day of February 2025.

/s/Dorsey R. Carson, Jr.

Dorsey R. Carson, Jr. (MS Bar #10493)

Kathryn P. Goff (MS Bar #105678)

Nicholas J. Toca (MS Bar #106530)

Attorneys for Defendants

MAKERSTAR CAPITAL, INC., JEFFREY BELL,
IN HIS OFFICIAL CAPACITY AS A
REPRESENTATIVE OF MAKERSTAR CAPITAL,
INC.

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CERTIFICATE OF SERVICE

I, Dorsey R. Carson, Jr., hereby certify that on this day I electronically filed the foregoing pleading or other paper with the Clerk of Court using the CM/ECF system, which sent notification of such filing to all counsel of record.

This the 27th day of February 2025.

/s/Dorsey R. Carson, Jr.
OF COUNSEL